

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE,  
SPRING VALLEY BRANCH, *et al.*,**

**Plaintiffs,**

**v.**

**EAST RAMAPO CENTRAL SCHOOL  
DISTRICT, *et al.*,**

**Defendants.**

**ECF CASE**

**Case No. 7:17-cv-08943**

**DISTRICT JUDGE  
CATHY SEIBEL**

**MAGISTRATE JUDGE  
JUDITH C. MCCARTHY**

**DECLARATION OF DAVID BUTLER PURSUANT TO THE COURT'S MARCH 26,  
2018 ORDER**

Pursuant to 28 U.S.C. § 1746, David J. Butler declares under penalty of perjury as follows:

- A. I am a Partner at Morgan, Lewis & Bockius LLP, 1111 Pennsylvania Avenue, NW, Washington, DC 20004. I represent the East Ramapo Central School District ("the District") in the above captioned action. The following are stated on my personal knowledge and to the best of my present understanding and recollection.
- B. I am a member in good standing of the bars of the State of New York and the District of Columbia.
- C. I submit this declaration pursuant to the Court's March 26, 2018 scheduling order.
- D. Attached to this Declaration is a true and correct copy of Dr. John Alford's Affidavit of Direct Examination.
- E. Attached as Exhibit 1 is a true and correct copy of John Alford's Curriculum Vitae.
- F. Attached as Exhibit 2 is a true and correct copy of the preliminary expert report of Dr. Steven P. Cole.

- G. Attached as Exhibit 3 is a true and correct copy of the transcript from the first deposition of Dr. Steven P. Cole.
- H. Attached as Exhibit 4 is a true and correct copy of the rebuttal expert report of Dr. Steven P. Cole.
- I. Attached as Exhibit 5 is a true and correct copy of an article written by Karen Ferree, titled *Iterative Approaches to RxC Ecological Inference Problems, Where they Can Go Wrong and One Quick Fix*.
- J. Attached as Exhibit 6 is a true and correct copy of an article written by Ori Rosen et al., titled *Bayesian and Frequentist Inference for Ecological Inference: the RxC Case*.
- K. Attached as Exhibit 7 is a true and correct copy of an article written by Oivia Lau et al., titled *eiPack: RxC Ecological Inference and Higher-Dimension Data Management*.
- L. Attached as Exhibit 8 is a true and correct copy of an article written by Kimball Brace et al., titled *Minority Voting Equality: The 65 Percent Rule in Theory and Practice*.
- M. Attached as Exhibit 9 is a true and correct copy of an article written by Bernard Grofman et al., titled *A Reply to Zax's (2002) Critique of Grofman and Migalski (1988)*.
- N. Attached as Exhibit 10 is a true and correct copy of an article written by Kosuke Imai et al., titled *Improving Ecological Inference by Predicting Individual Ethnicity from Voter Registration Records*.
- O. Attached as Exhibit 11 is a true and correct copy of an article written by King et al., titled *Binomial-Beta Hierarchical Models for Ecological Inference*.
- P. Attached as Exhibit 12 are true and correct excerpts from the supplemental document production of Dr. Steven P. Cole.
- Q. Attached as Exhibit 13 is a true and correct copy of the declaration of Dr. John Alford.

- R. Attached as Exhibit 14 is a true and correct copy of an article written by Loren Collingwood et al., titled *eiCompare: Comparing Ecological Inference Estimates Across EI and EI:RxC*.
- S. Attached as Exhibit 15 is a true and correct copy of an article written by Matt Barreto et al., titled *Estimating Candidate Support: Comparing Iterative EI & EI-RxC Methods*.
- T. Attached as Exhibit 16 is a true and correct copy of a chapter written by Yishaiya Absoch et al., titled *An Assessment of Racially Polarized Voting For and Against Latino Candidates in California*.

Dated: March 28, 2018.

/s/ David J. Butler  
David J. Butler